

**ROPERASW FCC TCPA REPLY COMMENTS**

RoperASW is a national survey research company, which is celebrating its 80<sup>th</sup> anniversary in 2003.

Survey Research provides a valuable function in the United States. It assists manufacturers to identify, understand and meet consumer needs and wants. It saves consumers' money by providing data to companies to help them reduce the costs associated with new product failures. It assists manufacturers and service providers to improve the quality and usefulness of the products and services, and much, more. Participation in survey research can result in better healthcare, better and less expensive products and better services. Likewise, survey research provides lawmakers and policymakers with information about the public's opinion on critical issues, allowing them to make decisions with the public's views in mind.

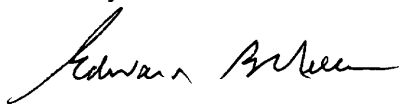
The current Telephone Consumer Protection Act (TCPA) Rules, specifically those restricting automatic telephone dialing systems, limit a survey research company's ability to gain a representative sample of the population. The restrictions have the further potential effect of restricting all survey research calls made using such technology, since it is difficult to identify cellular telephone numbers, especially those that are regulated under the TCPA Rule (i.e. those which are "charged for the call"). This identification becomes more problematic when number portability takes effect.

RoperASW, in support of CMOR's Comments, is concerned that the exclusion of cellular telephone numbers from the universe of potential survey respondents will have the effect of introducing statistical bias to the survey results, which may lead to erroneous conclusions about respondents' needs.

Further, that the bias cannot be overcome by drawing more landline numbers, due to the potential demographic differences between the two groups. We therefore support the position put forth by CMOR regarding the survey research industry's concern over the exclusion of cell phone numbers from the universe of potential survey respondent and the impact it will have on the reliability of survey results. We further support its proposal to exempt survey research calls from the TCPA Rules and/or provide an exemption for survey research calls in the restrictions to cellular numbers.

Thank you.

Sincerely,



Edward B. Keller  
Chief Executive Officer